

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:	)	Chapter 11
	)	
JOANN INC., et al. <sup>1</sup>	)	Case No. 25-10068 (CTG)
	)	
Debtors.	)	(Jointly Administered)
	)	
	)	<b>Re: Docket Nos. 760, 863, 1002 &amp; 1455</b>

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**CERTIFICATION OF COUNSEL REGARDING FIRST NOTICE  
OF ASSUMPTION AND ASSIGNMENT OF CERTAIN  
EXECUTORY CONTRACTS AND/OR UNEXPIRED LEASES**

The undersigned counsel to Ann Aber in her capacity as Plan Administrator in the above-captioned cases (the “Plan Administrator”) hereby certifies as follows:

1. On April 28, 2025, the Debtors filed the *First Notice of Assumption and Assignment of Certain Executory Contract and/or Unexpired Leases* [Docket No. 760] (the “First Assumption Notice”) regarding the assumption and assignment of certain unexpired leases set forth in the First Assumption Notice (the “Original Assumption List”). Attached to the First Assumption Notice was a proposed form of order (the “Assumption Order”) authorizing the assumption and assignment of the unexpired leases on the Original Assumption List.

2. The deadline to object to the First Assumption Notice was May 12, 2025 (the “Objection Deadline”).

3. On May 12, 2025, Cavender Stores, L.P. (“Cavender”) filed *Cavender Stores, L.P.’s Objection to First Notice of Assumption and Assignment of Certain Executory Contract*

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

*and/or Unexpired Leases* [Docket No. 863] (the “Cavender Objection”) objecting to the proposed assumption and assignment of a certain nonresidential real property lease dated January 18, 2010 between Jo-Ann Stores, LLC and Integris Ventures-TC, LLC (the “Landlord”) that was included in the Original Assumption List to Boot Barn, Inc. (“Boot Barn”).

4. On May 27, 2025, Boot Barn filed the *Reply of Boot Barn, Inc. to Cavender Stores, L.P.’s Objection to First Notice of Assumption and Assignment of Certain Executory Contract and/or Unexpired Leases* [Docket No. 1002].

5. On July 28, 2025, Cavender withdrew the Cavender Objection [Docket No. 1455].

6. Attached as Exhibit A is a revised Assumption Order (the “Revised Assumption Order”). A redline comparing the Revised Assumption Order to the Assumption Order is attached hereto as Exhibit B.

7. Any leases subject to unresolved objections and informal comments received regarding the remaining balance of the leases included in the First Assumption Notice (collectively, the “Outstanding Leases”) are not included in the Revised Assumption Order. For the avoidance of doubt, the First Assumption Notice remains pending, and has not been withdrawn, with respect to the Outstanding Leases.

8. Accordingly, the Plan Administrator requests entry of the Revised Assumption Order attached hereto as Exhibit A at the Court’s earliest convenience.

[*Remainder of this page intentionally left blank.*]

Dated: July 30, 2025  
Wilmington, Delaware

/s/ Jack M. Dougherty

**COLE SCHOTZ P.C.**

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